

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,
Plaintiff,

v.

No. 09-cv-11986-DPW

\$995,233.44 SEIZED FROM
BANK OF AMERICA ACCOUNT
NUMBER 898018373449 IN THE
NAME OF ROSEMONT R CORPORATION
D/B/A SPECTRE CAPITAL, INC.,
Defendant.

**JOINT MOTION FOR FINAL JUDGMENT AND ORDER OF FORFEITURE, and
ORDER RELEASING OTHER PROPERTY**

The United States of America and Spectre Capital, Inc.
(collectively, the "Parties"), by their undersigned attorneys,
jointly move that this Court endorse the proposed Final Judgment
and Order of Forfeiture and Order Releasing Other Property
submitted herewith, ordering the forfeiture to the United States
of \$350,000.00 of the captioned Defendant Property, together with
any interest or other return thereon since the time of seizure,
pursuant to Title 18, United States Code, Sections 981(a)(1)(A)
and 984, and releasing the remainder of that Defendant Property.

In support of this Motion, the parties state that they have settled this action, and after due notice, no claims to the captioned Defendant Property have been filed, other than the claim filed by Spectre Capital, Inc.

Respectfully submitted,

CARMEN M. ORTIZ,
United States Attorney

By: /s/Richard L. Hoffman
Richard L. Hoffman
Neil J. Gallagher
Assistant U.S. Attorneys
1 Courthouse Way, Suite 9200
Boston, Massachusetts 02210
(617) 748-3279

Date: January 11, 2011

SPECTRE CAPITAL, INC.,
By its attorneys,

/s/Thomas E. Butler
Thomas E. Butler
Chadbourn & Parke LLP
30 Rockefeller Plaza
New York, NY 10112
(212) 408-5283

Dated: January 11, 2011

CERTIFICATE OF SERVICE

I hereby certify that today I am filing the foregoing motion, together with the proposed order, via the ECF system, which will cause copies to be sent by email to claimant's counsel.

s/Richard L. Hoffman

Richard L. Hoffman

Dated: January 11, 2011

Assistant U.S. Attorney